



**Comments  
on  
Draft Central Electricity Regulatory Commission (Sharing of  
inter-State Transmission Charges and Losses) (Third  
Amendment) Regulations, 2023**



Submitted By

Dr. Sudarshan Kumar Babu Valluru

Professor (Group-A, Gazetted)

Department of Electrical Engineering

Delhi College of Engineering

Delhi Technological University

Delhi -110 042, INDIA

Office Room:FW1-SF10

E-mail: [sudarshan\\_valluru@dce.ac.in](mailto:sudarshan_valluru@dce.ac.in)

Submitted

To

**Central Electricity Regulatory Commission**

## Sharing Regulations - 3rd Amendment:

### *The proposed amendment*

- ❖ to determine the regional component and national components of HVDC system
- ❖ to be determined based on the reverse flow in the subject lines.
- ❖ more rational than the existing methodology

### *Issues: Missing many genuine concerns*

- ❖ The planned outage, forced outage, outage allowed under regulations, availability/unavailability of parallel lines, operating conditions, ambient conditions, sharing ratio etc.,
- ❖ independent of actual utilization of the intended purpose
- ❖ may invite litigations for a certain range of HVDCr, let's say 29 to 31

## Suggested Methodology:

Consider forward flows ( $HVDC_f$ ) as well as reverse flows ( $HVDC_r$ )

$HVDC_f$  - Regional Component

$HVDC_r$  - National Component

$$HVDC_f = \frac{\sum_{k=1}^n \text{Maximum power flow in forward direction ( MW) in any time block on } k^{th} \text{ day}}{\text{Capacity of HVDC transmission system in forward direction (MW)} \times \text{number of days in a month}}$$

$$HVDC_r = \frac{\sum_{k=1}^n \text{Maximum power flow in reverse direction ( MW) in any time block on } k^{th} \text{ day}}{\text{Capacity of HVDC transmission system in forward direction (MW)} \times \text{number of days in a month}}$$

$$\text{Regional Component (\%)} = \mathbf{100} \times \frac{HVDC_f}{HVDC_f + HVDC_r}$$

$$\text{National Component (\%)} = \mathbf{100} \times \frac{HVDC_r}{HVDC_f + HVDC_r}$$

Thanking You